1 LOKER LAW, APC KIND LAW Matthew M. Loker, Esq. (279939) Michael Kind, Esq. (13903) 2 matt@loker.law mk@kindlaw.com 3 1303 East Grand Avenue, Suite 101 8860 South Maryland Pkwy, Ste. 106 Arroyo Grande, CA 93420 Las Vegas, NV 89123 4 Telephone: (805) 994-0177 Telephone: (707) 337-2322 5 Facsimile: (805) 994-0197 Facsimile: (707) 329-5881 6 Attorney for Plaintiff, 7 **Christopher Petras** 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 CHRISTOPHER PETRAS, Case No.: 20-cv-874-RFB-BNW 11 Plaintiff, THIRD STIPULATION TO 12 v. **CONTINUE DATES IN** 13 **SCHEDULING ORDER** LOKER LAW, APC 1303 East Grand Avenue, Suite 101 ARROYO GRANDE, CA 93420 14 NAVY FEDERAL CREDIT HON. BRENDA WEKSLER **UNION; JPMORGAN CHASE** 15 **BANK, NATIONAL ASSOCIATION; EQUIFAX** 16 **INFORMATION SERVICES** 17 LLC; AND, EXPERIAN INFORMATION SOLUTIONS, 18 INC. 19 Defendant. 20 21 22 23 24 25 26 27 28

SECOND STIPULATION TO CONTINUE DATES IN SCHEDULING ORDER

Case No.: 20-cv-874-RFB-BNW

Petras v. Navy Federal Credit Union, et al.

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TO THIS COURT AND TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

WHEREAS, this Court issued its Scheduling Order on July 8, 2020, ECF No. 18;

WHEREAS, the Parties sought to continue dates in the Scheduling Order on October 1, 2020, ECF No. 32;

WHEREAS, this Court denied the Parties' first Stipulation on October 6, 2020, ECF No. 34;

WHEREAS, the Parties filed their Second Stipulation to extend dates in the Discovery Plan and Scheduling Order further outlining the good cause for said request, ECF No. 35, which was granted on October 14, 2020, ECF No. 37;

WHEREAS, Plaintiff Christopher Petras ("Plaintiff") has issued deposition notices to Defendant JPMorgan Chase Bank, N.A. to take place in October 2020, later continued to November 2020. However, Chase then moved for a protective order. ECF No. 39. This Court set the hearing on Chase's motion for January 9, 2021. ECF No. 40. Plaintiff therefore agreed to continue the depositions until a date after the January 2021 hearing.

However, Plaintiff's experts are expected to rely on the testimony given at those depositions and the current deadline to disclose experts is January 4, 2021. ECF No. 37. Therefore, Plaintiff requests additional time to disclose his experts. Defendants do not oppose this request for an extension.

WHEREAS, the Parties are working together in good faith to grant needed extensions on written discovery and find mutually agreeable dates for depositions;

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THEREFORE, the Parties jointly request the Court extend remaining dates in the Scheduling Order by 60 days as follows:

<u>EVENT</u>	<u>CURRENT</u>	<u>PROPOSED</u>
Expert Disclosures (Initial)	January 4, 2021	March 4, 2021
Expert Disclosures (Rebuttal)	February 3, 2021	April 5, 2021
Discovery Cut-Off	March 8, 2021	May 7, 2021
Dispositive Motions	April 5, 2021	June 4, 2021
Pretrial Order	June 1, 2021	July 1, 2021

Date: December 9, 2020 KIND LAW

By: /s/ Michael Kind MICHAEL KIND, ESQ. ATTORNEY FOR PLAINTIFF

CLARK HILL PLLC

By: <u>/s/ Jeremy J. Thompson</u>
JEREMY J. THOMPSON, ESQ.
ATTORNEY FOR DEFENDANT, EQUIFAX

NAYLOR & BRASTER

By: <u>/s/ Andrew Sharples</u>
ANDREW SHARPLES, ESQ.
ATTORNEY FOR DEFENDANT, EXPERIAN

BALLARD SPAHR LLP

By: <u>/s/ Joel E. Tasca</u>
JOEL E. TASCA, ESQ.
ATTORNEY FOR DEFENDANT, CHASE

Case No.: 20-cv-874-RFB-BNW 2 of 4 Petras v. Navy Federal Credit Union, et al.

LOKER LAW, APC 1303 East Grand Avenue, Suite 101 ARROYO GRANDE, CA 93420

SCHEDULING ORDER

The above-set stipulated Amendments to the Discovery Plan of the parties shall be the Amended Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED

DATED: 4:39 pm, December 11, 2020

BRENDA WEKSLER

UNITED STATES MAGISTRATE JUDGE

Case No.: 20-cv-874-RFB-BNW